

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-against-

PEDRO GUZMAN,  
a/k/a "Franklyn," and  
EDWIN HENRIQUEZ,  
a/k/a "Carlos,"

Defendants.

**NOTICE OF MOTION**

S13 06 Cr. 1014 (AKH)

PLEASE TAKE NOTICE, that upon the Declaration of Alan R. Kaufman, dated November 8, 2007, and accompanying Exhibits, and upon the accompanying Memorandum of Law, defendant Edwin Henriquez ("Henriquez") will move this Court, at a date to be determined by the Court, for an order:

- (i) directing the Government to provide certain discovery and particulars to Henriquez;
- (ii) directing the Government to provide certain *Brady* material to Henriquez; and
- (iii) such other and further relief as the Court deems just and proper.

Dated: New York, New York  
November 8, 2007

KELLEY DRYE & WARREN LLP  
Attorneys for Defendant Edwin Henriquez

By: Alan R. Kaufman  
Alan R. Kaufman (AK6884)  
James M. Keneally (JK8447)  
101 Park Avenue  
New York, NY 10178  
(212) 808-7800

To: Marissa Molé, Esq.  
Christopher LaVigne, Esq.  
United States Attorney's Office  
One St. Andrew's Plaza  
New York, New York 10007